



**HARTCROWSER**

Delivering smarter solutions

www.hartcrowser.com

WA 3019  
6-15-01

14f

June 15, 2001

Kim Ogle, RCRA Project Manager  
United States EPA, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

**Re: June 15, 2001 Progress Report  
J. H. Baxter Arlington Facility  
Docket No. RCRA-10-2001-0086  
7026-04**

Dear Ms. Ogle:

This letter provides the June 2001 progress report for work completed under the Administrative Order on Consent (AOC) for the J. H. Baxter Arlington, Washington, facility for the period May 15, 2001, and June 15, 2001.

## SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses the significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred, on this project include:

- The Drinking Water Sampling and Alternate Water Supply Work Plan (Work Plan) was submitted to EPA on May 15, 2001, as required by the AOC.
- A meeting was held between Baxter and EPA on May 16, 2001, to discuss the Excess Stormwater Management Plan.
- We received comments on the Work Plan from EPA on June 4, 2001, and discussed those comments with EPA on June 8, 2001.
- We began gathering data for the well inventory on June 4, 2001, and are currently in the field conducting a door-to-door survey. We are also preparing a revised Work Plan to be submitted on June 18, 2001, two weeks from the date of EPA's comment letter.
- In conjunction with the Drinking Water Sampling and Alternate Water Supply Work Plan submitted on May 15, 2001, we submitted to EPA our Health and Safety Plan, which will be implemented during any work performed under this AOC.

Anchorage

FILE COPY

Boston

Chicago

Denver

Fairbanks

Jersey City

Juneau

Long Beach

Portland

Seattle

USEPA RCRA



3019598



EPA  
May 15, 2001

7026-04  
Page 2

- On May 15, 2001, we submitted the first monthly progress report to EPA.
- The Excess Stormwater Management Plan was submitted to EPA on May 30, 2001, as required by the AOC.
- The Site Investigation Work Plan was submitted to EPA on June 14, 2001, as required by the AOC. The comprehensive stand alone data document defined by Attachment B, paragraph C. was submitted in conjunction with the Site Investigation Work Plan, as Volume II to the Site Investigation Work Plan.

## **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period and includes a schedule of actions to be performed.

We plan to complete the drinking water well inventory within the next two weeks., We plan to begin sampling water wells the last week in June, and hope to complete the sampling by July 2, 2001.

In addition, we are talking to surveyors about development of an updated facility topographic map for use in completing the design of the excess stormwater management system. We hope to receive EPA comments on the Excess Stormwater Management Plan in early July to allow time to complete the design and install the system before the next wet season.

## **ANTICIPATED PROBLEMS AND PROBLEM RESOLUTION**

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

There are no past or anticipated problems at this time.

## **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.





EPA  
May 15, 2001

7026-04  
Page 3

The results of sampling conducted in March and April under the Washington State Department of Ecology State Waste Discharge Permit are included in Volume II of the Site Investigation report. Specifically the following data were received and validated:

- The second round of lysimeter sampling (L-1, L-2, L-3) conducted on 3/28/01 (last table in Volume II). These three water samples were non-detect for PCP. L-1 detected 0.53 ug/L TPH-D, slightly above the detection limit of 0.5 ug/L. Reported dioxin levels were 0.9, 0.0006, and 4.33 pg/L in L-1 through L-3, respectively.
- French drain sampling in the Untreated Pole Storage Area occurred on 3/19/01 in individual Drains 1 through 12, and 16 through 22. The PCP results indicated concentrations ranging from 1.7 ug/L (Drain 7) to 290 ug/L (Drain 16). The average PCP concentration of the 19 drain samples was 43 ug/L.
- Groundwater sampling occurred on 4/4/01 and 4/5/01 in site wells MW-1, MW-2, MW-3, HCMW-5, HCMW-7, BXS-1, BXS-2, BXS-3, and BXS-4. PCP concentration were non-detect except in MW-3 (PCP concentration of 1,200 ug/L) and BXS-1 (PCP concentration of 27 ug/L). Dioxin concentrations were non-detect in the BXS wells and MW-3, and ranged between 0.257 pg/L (HCMW-5) and 9.45 pg/L (HCMW-7) in the other wells.

Since the chemical data were submitted yesterday in Volume II of the Site Investigation Work Plan, we have not included a table of these recent data with this report. Future progress reports will provide a summary table of the results received for that progress report period for easy review.

We trust this letter provides an update of the project progress. Please let us know if you have any questions or comments on the work conducted to date, or contents of this report.

Sincerely,

**HART CROWSER, INC.**

**LORI HERMAN**

Principal Hydrogeologist

F:\Docs\Jobs\702604\progress letters\Progress Letter 6-15-01.doc

cc: Georgia Baxter, J. H. Baxter  
Sara Beth Watson, Steptoe and Johnson